

No. 23-11854-D

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**In the United States Court of Appeals  
for the Eleventh Circuit**

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GRACE, INC.; ENGAGE MIAMI, INC.;  
SOUTH DADE BRANCH OF THE NAACP;  
MIAMI-DADE BRACH OF THE NAACP;  
CLARICE COOPER; YANELIS VALDES;  
JARED JOHNSON; AND ALEXANDER  
CONTRERAS,

*Plaintiffs/Appellees,*

v.

CITY OF MIAMI,

*Defendant/Appellant.*

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**APPELLANT'S MOTION FOR LEAVE TO FILE  
DOCUMENTS OUT OF TIME**

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*Attorneys for Defendant/Appellant*

**CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

Appellant, the City of Miami, furnishes this certificate of interested persons and corporate disclosure statement.

1. ACLU Foundation of Florida, Inc., Counsel for Plaintiffs/Appellees
2. Bardos, Andy, Counsel for Defendant/Appellant
3. Carollo, Joe, Defendant/Appellant
4. City of Miami, Defendant/Appellant
5. Cody, Steven, Defendant/Appellant's expert
6. Contreras, Alexander, Plaintiff/Appellee
7. Cooper, Clarice, Plaintiff/Appellee
8. Covo, Sabina, Defendant/Appellant
9. De Grandy, Miguel, Defendant/Appellant's expert
10. Dechert LLP, Counsel for Plaintiffs/Appellees
11. Diaz de la Portilla, Alex, Defendant/Appellant
12. Engage Miami, Inc., Plaintiff/Appellee
13. GrayRobinson, P.A., Counsel for Defendant/Appellant
14. Grace, Inc., Plaintiff/Appellee
15. Greco, John A, Counsel for Defendant/Appellant
16. Johnson, Christopher N., Counsel for Defendant/Appellant

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17. Johnson, Jared, Plaintiff/Appellee
18. Jones, Kevin R., Counsel for Defendant/Appellant
19. King, Christine, Defendant/Appellant
20. Kirsch, Jocelyn Kirsch, Counsel for Plaintiff/Appellee
21. Levesque, George T., Counsel for Defendant/Appellant
22. McNamara, Caroline A., Counsel for Plaintiff/Appellee
23. McNulty, Kerri L., Counsel for Defendant/Appellant
24. Méndez, Victoria, Counsel for Defendant/Appellant
25. Merken, Christopher J., Counsel for Plaintiff/Appellee
26. Miami-Dade Branch of the NAACP, Plaintiff/Appellee
27. Moore, K. Michael, United States District Judge, Southern District of  
Florida
28. Quintana, Marlene, Counsel for Defendant/Appellant
29. Reyes, Manolo, Defendant/Appellant
30. South Dade Branch of the NAACP, Plaintiff/Appellee
31. Steiner, Neil A., Counsel for Plaintiff/Appellee
32. Suarez, Francis, Defendant/Appellant
33. Tilley, Daniel T., Counsel for Plaintiff/Appellee
34. Unger, Jason L., Counsel for Defendant/Appellant
35. Valdes, Yanelis, Plaintiff/Appellee

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36. Warren, Nicholas L.V., Counsel for Plaintiff/Appellee

37. Wyson, George, Counsel for Defendant/Appellant

Appellant, the City of Miami, certifies that, to the best of its knowledge, no publicly traded company or corporation has an interest in the outcome of the case or appeal.

**MOTION FOR LEAVE TO FILE DOCUMENTS OUT OF TIME**

Appellant, the City of Miami, respectfully moves this Court for leave to file the attached Civil Appeal Statement and Transcript Order Form out of time. The delay, which resulted from inadvertence of counsel, has caused no prejudice to any party.

Appellees oppose the relief requested in this motion and intend to file a response.

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT,  
TYPEFACE REQUIREMENTS, AND TYPE-STYLE REQUIREMENTS**

This document complies with the word limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because, excluding the parts of the document exempted by Rule 32(f), this document contains 63 words.

This document was prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font and therefore complies with the typeface requirements of Rule 32(a)(5) and the type-style requirements of Rule 32(a)(6).

/s/ George T. Levesque

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